Reply to Office Action of January 5, 2006

### **REMARKS**

The Applicant respectfully requests entry of the above amendments, and consideration of the application, as amended.

By this Amendment many of the claims were amended to more particularly point out and distinctly claim the subject invention and to place the claims in better form for allowance. The addition of "new matter" has been scrupulously avoided.

# 1. Status of Claims and Support of Claim Changes

Claims 1-39 are now pending in this application. Claims 1, 3, 4, 5, 8, 10, 12-15, 23, 24-36 have been amended. New claims 37-39 were also introduced. New claims 24-39 were introduced to the claims that appear in the subject patent. Support for each claim amendment is identified in Table 1 below.

Table 1			
Support for Claim Amendments			
Claim	Amendment	Support	
3	"a weld"	3:12-16	
4	"an adhesive"	3:12-16	
5	"solder"	3:12-16	
8	"more than"	8:44-45 and Figure 4	
12	"extent"	Spelling correction.	
15	. "11"	Pendency correction.	
23	"19"	Pendency correction.	
24	"screws"	9:39-41	
25	"a shrink fit"	9:23-33	
26	"plurality of openings	9:12-16	
27	"at least 85% of the axial	10:25-30	
	length"		

Table 1		
Support for Claim Amendments		
Amendment	Support	
not provide substantial	4:17-20	
structural support"		
screening medium	10:25-30	
tilizes 85-95% of the		
screen cylinder axial		
length"		
"heat-treating"	12:29-31	
	9:39-41	
sives, and solders"		
means for releasably	Throughout the specification.	
connecting"		
"a weld"	3:12-16	
"an adhesive"	3:12-16	
"solder"	3:12-16	
"screws"	9:39-41	
"screening medium	Throughout the specification.	
comprises a plate"		
'contoured grooves"	Abstract and throughout	
	specification.	
screening medium	Throughout the specification.	
nprises a screen plate"		
	Amendment o not provide substantial structural support"screening medium tilizes 85-95% of the screen cylinder axial length" "heat-treating" elding, rivets, screws, esives, and solders" means for releasably connecting" "a weld" "an adhesive" "screws" "screws"	

# 2. Litigations

Pursuant to 37 CFR 1.178(b) the Applicant submits that U.S. Patent 5,200,072 is not the subject of any prior or concurrent proceedings, including reexaminations and litigations.

Reply to Office Action of January 5, 2006

# 3. Response to Elected Invention

In the first paragraph on page 2 of the Office Action, the Patent Office confirmed that the subject matter for which this reissue application is sought was not an invention that was not elected during the prosecution of parent application 07/573,839.

### 4. Response to Minor Formalities

In the second paragraph on page 2 of the Office Action, the Patent Office objected to claims 1, 10, and 12 due to miscellaneous wording and wording order. The Applicant believes that the above Amendment overcomes these objections.

Though the Applicant acknowledges with appreciation the Patent Office's assistance by making suggestions to overcome these rejections, the Applicant respectfully suggests that amendments that appear above may more accurately address the Patent Office's concerns. For example, with respect to claim 1, the Applicant suggests that the "and" appear as shown so that the structures and structure limitations are more clear, concise, and, in more accepted format, as indicated by the abbreviated presentation of the elements of claim 1 below.

a generally cylindrical screening medium...;

a generally cylindrical structural backing plate...;

said screening medium and said structural backing plate lying...;

one of said screening medium and said backing plate having...; and

a plurality of axially spaced ridges or bands...;

the openings in said screening medium being....

Should the Patent Office believe otherwise, the Applicant is willing to amend claim 1 accordingly.

Reply to Office Action of January 5, 2006

In a similar manner, with respect to claim 10, the Applicant believes that the proposed placement of the word "and" between the two structures, that is,

a screening medium...; and

a structural backing plate...;

is also more clear and concise.

Also, thank you for bringing the misspelling of "extent" in claim 12 to our attention.

## Response to Reissue Amendment Format

In the last paragraph on page 2 of the Office Action, the Patent Office objected to the claim amendment format in the earlier amendment. The Applicant believes that the format used in the above amendment conforms to the practices recited in 37 CFR 1.173.

# Response to 35 USC §112, first paragraph, Rejections

In the last paragraph on page 3 of the Action, the Patent Office rejected claims 1-9, 26, 28, 29, and 31 under 35 USC §112, first paragraph, for failing to comply with the rewritten description requirement. With respect to claims 1-9, the Patent Office objected to the use of the term "projections." However, the Applicant respectfully asserts that the term "projection" recited in claim 1 is appropriate and would be understood by one skilled in the art in view of the specification and drawings.

It is well established in the law that there is no requirement for the applicant to provide the exact words that appear in a claim in the specification. The entire disclosure need only indicate that the applicant had possession of the claimed invention. For example, in *Fujikawa v. Wattanasin*, the Federal Circuit held:

[I]psis verbis disclosure is not necessary to satisfy the written description requirement of section 112. Instead, the disclosure need only reasonably convey to persons skilled in the art that the inventor had possession of the subject matter in question. In re Edwards, 568 F.2d 1349, 1351-52, 196 USPQ 465, 467 (CCPA 1978). Fujikawa v. Wattanasin, 39 USPQ 2d 1895, 1904 (Fed. Cir. 1996)

Moreover, the Federal Circuit also held that the drawings alone may provide sufficient §112 support. For example, in *Vas-Cath, Inc. v. Mahurkar*, the court held,

[U]nder proper circumstances, <u>drawings alone</u> may provide a "written description" of an invention as required by § 112. *Vas-Cath*, *Inc. v. Mahurkar*, 19 USPQ 2d 1111, 1118 (Fed. Cir. 1991) [Emphasis added.]

A casual review of Figure 2 clearly shows that items 24, though described as "ridges or bands" in the specification, clearly comprise projections from the surface of plate 12. In view of what is shown in Figure 2 and the entire specification, the term "projections" would be understood by one of skill in the art from reviewing the specification, including the drawings. The Applicant's position is underscored by the acceptance of the term "projections" during the earlier prosecution of these claims. The applicant submits that no further amendment is necessary. Thus, it is respectfully requested that this rejection be withdrawn.

On pages 4-6 of the Action, the Patent Office also rejected claims 8, 26, 28, 29, 31, and 37 under 35 USC §112. The Applicant believes that the above Amendment overcomes these rejections.

# 7. Response to 35 USC §112, second paragraph, Rejections

On pages 6-10 of the Action, the Patent Office rejected claims 3-5, 12-15, 18-23, 25-29, 31 and 33 under 35 USC §112, second paragraph, as being indefinite. The Applicant believes that the above Amendment overcomes these rejections under 35 USC §112.

Reply to Office Action of January 5, 2006

With respect the rejection of claim 18-23, the Applicant submits that support for the "inclined relative to the longitudinal extent" may be found at passage 6:50-59 in the patent. Specifically, step (c) in the recited method states:

(c) forming elongated grooves in the second face of the screening plate <u>inclined</u> relative to the <u>longitudinal extent of the grooves</u> formed in step (a) [Emphasis added.]

Thus, the Applicant submits that there is support for this limitation in claim 18, and in dependent claims 19-23. The Applicant respectfully requests that these rejections be reconsidered and withdrawn.

With respect to the rejection of claims 25, 26, 27, 28, 29, and 31 as being indefinite, the Applicant believes that the above Amendment also overcomes these rejections.

## 8. Response to Impermissible Broadening under 35 USC §251

On pages 10 and 11 of the Action, the Patent Office rejected claims 1-9 in view of the former wording of claim 26. The Applicant believes that new claim 26 presented in the above Amendment overcomes these rejections.

# 9. Response to 35 USC §102 Anticipation Rejections based upon Mathewson

On pages 11 through 15 of the Action, the Patent Office Rejected claims 1, 2, 6, 8-17, 24, 26, 29, 31, 32, 36, and 37 under 35 USC §102(b) as anticipated by U.S. Patent 2,450,838 of Mathewson [herein "Mathewson"]. The Applicant respectfully submits that these rejections are inappropriate and requests that these rejections be reconsidered and withdrawn based upon the following comments and observations.

The Applicant's undersigned Agent typically refers to the MPEP for guidance when considering whether an anticipation rejection is appropriate. For instance, MPEP § 2131 defines the conditions under which an anticipation rejection is appropriate:

Reply to Office Action of January 5, 2006

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim...

The Applicant submits that, contrary to the requirements for an appropriate anticipation rejection as outlined in the MPEP, Mathewson does not include "each and every element" of the invention recited in these claims, nor does Mathewson show the invention "in as complete detail" as in these claims.

With respect to claim 1, the Applicant respectfully submits that the Patent Office appears to have grossly misinterpreted the disclosure of Mathewson. For this reason, the Applicant believes that it may be instructive to review the teachings of Mathewson. Among other things, the Applicant believes that this review will dramatically underscore the distinctions between Mathewson and the invention recited in claim 1.

First, as described by its title, Mathewson does disclose a "paper pulp screen," that is, a device that is intended to perform many of the functions of the invention recited in claim 1. However, there the similarity ends. As recited lines 16-22 in column 1 of Mathewson, the disclosed invention is

...a pulp screen in which the screening means is constituted by two parallel walls separated by <u>a small clearance space</u> which is of sufficient size to permit the fine acceptable portion to pass therethrough but which is insufficient in size to permit the coarse material or refuse to pass... [Emphasis added.]

That is, according to the Mathewson invention, the separation or screening of pulp fractions is achieved by means of "a small clearance space," or, as we will shortly see, a small annular clearance space.

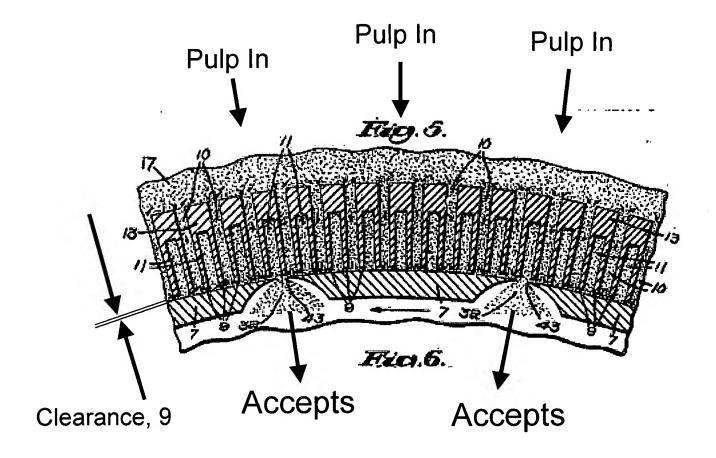
This annular clearance space is most clearly illustrated in Mathewson's Figures 5, 6, and 7. As described by Mathewson, Figures 5-7 illustrate "fragmentary transverse sectional views through the screening elements," that is, cross-sections of the screens. With reference to Figure 5, these figures illustrate cross sections of the assembly of Mathewson's <u>rotating</u> "inner screen member 7" and <u>stationary</u> "outer screen member 8". As described at 3:4-11, Mathewson's inner screen 7 and outer screen 8 are

spaced apart so as to provide <u>a small clearance space 9</u> which is of a size to permit the fine acceptable portions of the pulp to pass through but is insufficient in size to permit the coarse unacceptable portions of the pulp to pass. [Emphasis added.]

Again, as note above, the clearance space 9 between the inner rotating member 7 and the outer stationary member 8 provide the separation function of the device of Mathewson.

As described in, for example, column 4 of Mathewson, and summarized in the marked-up version of Figure 5 of Mathewson presented below, the pulp to be treated is introduced to the outside diameter of outer screen 8 and passes radially inward from chamber 17 through channel 11 (see Figures 11 and 12 of Mathewson), through the "small clearance 9" between stationary outer member 8 and rotating inner member 7. The accepts that pass through clearance 9 are discharged via openings 43 as shown in Figure 5, and the rejects are passed radially outward through channels 11 to chamber 18.

Reply to Office Action of January 5, 2006



Now, with this clear understanding of the components and operation of the Mathewson device, it will be clear that, to one of skill in the art, Mathewson does not anticipate, or in anyway suggest, the invention recited in, for example, claim 1.

In the last paragraph on page 11 of the Office Action, the Patent Office identified items 1, 21, 8, 30, 16, and 12 of Mathewson as the claimed "backing plate" and items 9, 10, 11, 13, 14, and 13a as the claimed "screening medium." Though the structure comprising items 1, 21, 8, 30, 16, and 12 of Mathewson may provide some form of structural support, the Applicant respectfully submits that items 9, 10, 11, 13, 14, and 13a [herein "the purported screening medium"] do not comprise a screening medium.

The Patent Office is reminded that the screening function performed by aspects of the invention is the separation by size of, for example, very fine paper pulp fibers.

These pulp fibers typically have diameters less than 50 microns (0.050 mm) and lengths of about 1 to 5 mm. These are very small particles. For this reason, a typical slot width for the present invention is about 0.2 mm (12:62).

First, items 10, 11, 13, 14, and 12 of the purported screening medium do not provide any form of screening function. Items 10, 11, 13, 14, and 13a are simply passages that do not isolate any one pulp fraction from any other pulp fraction. This is most clearly illustrated in Figures 5-7 and Figures 11 and 12 of Mathewson. As shown in Figures 5 (reproduced above) channels 10 and 11 and their corresponding channel-defining structures 13 and 14 are simply pathways through which the pulp slurry being treated accesses and then passes from the clearance 9. The minute arrows in Figures 5-7 clearly illustrate the passage of the unaffected slurry of pulp fibers through channels 10 and 11. The very small fibers described above would not be affected, and clearly not separated by size, by channels 10 and 11. Figures 11 and 12 more clearly illustrate the channel/structure relationship of channels 10 and 11 and structures 13 and 14. Again, these items simply provide pathways; no pulp separation or screening-type function is provided by any of these structures.

Second, the only structure in Mathewson that is anyway remotely related to providing the screening function of the claimed "screening medium" of the present invention is the clearance 9 between stationary outer member 8 and rotating inner member 7. However, this clearance is not a "medium" as disclosed in claim 1 and as described throughout the instant specification. As described above, Mathewson provides the separation function of a screen by means of the annular clearance 9 between outer member 8 and inner member 7. Mathewson provides no "medium" for screening. The Applicant submits that an annular clearance is not a "medium" as disclosed in the subject patent. Again, items 10, 11, 13, 14, and 13a provide no screening function. For this reason alone, the Applicant submits that Mathewson does not anticipate claim 1.

Moreover, Matheson's clearance 9 does not provide a medium "having a plurality of openings therethrough" as claimed. As described in Mathewson, clearance 9 comprises a single annular slot between outer member 8 and inner member 7. Contrary to the comments made by the Patent Office, this single slot, in addition to not comprising a medium, does not comprise a plurality of openings. If anything, clearance 9 is a single opening. Again, for this reason, the Applicant submits that Mathewson does not anticipate the invention recited in claim 1.

Should the Patent Office confuse the "plurality of openings" in items 10, 11, 13, 14, and 12 as openings in the "screening medium," the Applicant, again, reiterates that these structures and their respective openings provide no screening function.

With respect to the rejections of dependent claims 2, 6, 8, 9, 24, 26, 29, and 31, the Applicant submits that these claims are not anticipated by Mathewson for the same reasons that claim 1, from which they depend, is not anticipated.

With respect to claim 10, the invention recited in claim 10 is not anticipated for the same reason that claim 1 is not anticipated. Namely, clearance 9 does not comprise a screening medium or a screening medium having a plurality of slots therethrough, as recited in claim 10.

With respect to the rejections of dependent claims 11-17, 32, and 36, the Applicant submits that these claims are not anticipated by Mathewson for the same reasons that claim 10, from which they depend, is not anticipated. The Applicant respectfully requests that these rejections be reconsidered and withdrawn.

# 10. Response to 35 USC §102 Anticipation Rejections based upon Gillespie

On pages 16 and 17 of the Action, the Patent Office Rejected claims 1-3, 9-12, 15, 17, 26-29, 32, and 33 under 35 USC §102(b) as anticipated by U.S. Patent 4,276,265 of Gillespie [herein "Gillespie"]. The Applicant respectfully submits that these

Reply to Office Action of January 5, 2006

rejections are also inappropriate and requests that these rejections be reconsidered and withdrawn based upon the following comments and observations.

The Applicant submits that, contrary to the requirements for an appropriate anticipation rejection as outlined in the MPEP, Gillespie does not include "each and every element" of the invention recited in these claims, nor does Gillespie show the invention "in as complete detail" as in these claims.

With respect to claim 1, first, Gillespie does not disclose, teach, or suggest a "screen cylinder" as recited in amended claim 1. Though claim 1 does not explicitly include the expression "pulp screening cylinder," one of skill in the art in view of the specification, would recognize that the recited screen cylinder is used for the screening of pulp fibers. For example, in the Background and Summary sections of the specification, <u>only</u> the art of pulp screening is discussed. Specifically, at 1:10-20, the inventors state:

In the formation of paper products from <u>pulp</u>, the <u>pulp</u> is typically screened such that impurities, such as sticks, shives and other undesirable <u>pulp</u> constituents, are removed. This screening process effectively separates the accept and reject portions of the <u>pulp</u>. Screening is generally performed using screen cylinders or flat plates, each of which is provided with openings therethrough for separating the accept and reject portions of the <u>pulp</u>. [Emphasis added.]

Clearly, the invention recited in claim 1 is a screen cylinder used in the treatment of pulp.

Moreover, the terms "screen," "screening," and "screen plate" are terms of the pulp treatment art, having specific meanings to those of ordinary skill in the pulp treatment art. For example, as shown in the attached excerpt from the <u>Handbook of Pulp and Paper Technology</u>, pp. 153-155 (Smook, 1990), these terms have the following definitions in this art:

SCREEN: Separation device utilizing some type of perforated barrier for removing unwanted material from a stock[\*] stream.

SCREENING: Process step involving passage of stock [\*] through some form of perforated barrier to remove oversize, troublesome and unwanted particles from good fiber.

SCREEN PLATE: Perforated metal plate utilized on many designs of pulp screening equipment that impedes pulp flow and is instrumental in causing a separation between suspended particles on the basis of their size, shape, and/or flexibility.

[\*] STOCK: A mixture of <u>pulp</u> and water with or without non-fibrous additives. [Emphasis added.]

Clearly, as explained in this well-recognized reference on pulp and paper technology, these terms have specific meaning in the art of the present invention and would be understood by those of skill in the art to have such meanings as presented in the present specification. The Applicant submits that this meaning of the term "screen plate" in claim 1 is consistent with this meaning in the art.

In contrast, the Gillespie device is neither intended to be used for or appropriate for use for the pulp treatment art. The Patent Office recognizes this limitation of Gillespie in the comments that appear in the second paragraph on page 16 of the Action where the Patent Office admits that "Gillespie is not directed to a pulp fiber sorting application." For this reason alone, the Applicant requests that this rejection be reconsidered and withdrawn.

However, should the Patent Office still consider Gillespie prior art for the invention recited in claim 1, the Applicant believes that a review of the art and teachings of Gillespie will be helpful. As described in, for example, its Title and Abstract, Gillespie discloses a screen for "collection and distribution of process streams." The function of the Gillespie screen is most clearly described at 2:48-65, where the use of the screen is described as passing a gas stream radially inward

Reply to Office Action of January 5, 2006

[t]o distribute the gas stream flow uniformly through the entire bed of catalyst pellets 16... The pellets 16 are retained against inward radial movement by the screen 14 which comprises profiled wire surfaces 28 which are supported by a plurality of channel shaped members 30 to which they are welded so as to define slots 32.

That is, the Gillespie screen is clearly not disclosed as a screen plate as used in the treatment of pulp.

Moreover, the slot sizing of the Gillespie screen further underscores how inappropriate the Gillespie device is for screening pulp fibers. At 2: 31-42, Gillespie states:

Catalyst, in the form of pellets 16 or other shapes, is contained between the facing screen surfaces. The catalyst is retained against outward radial movement by the profiled wires 20 which are welded to channel shaped members 22 at a uniform spacing to define flow passages or slots 24, as more clearly seen in FIG. 7. For clarity in the drawings, the slots 24 are shown to be wider than they would actually be for the size of pellets 16 shown in FIG. 1. For example, a typical pellet 16 would have a diameter of 0.062" while the slot openings 24 would be about 0.030". [Emphasis added.]

Clearly, the slot size of the Gillespie screen are quite appropriate for retaining 1/16 inch diameter catalyst pellets, but this slot size would be totally inappropriate for screening 50 micron diameter pulp fibers. As discussed above, pulp fibers have diameter less than 50 microns (0.050 mm) and typically slot widths of 0.2 mm would be used for aspects of the invention. In contrast, the Gillespie screen slots are 0.030 inches, that is, 0.762 mm. The slots of Gillespie are over three times the size of the slot width of the present invention. This difference in slot size will have dramatic effect upon the ability of the Gillespie screen cylinder as such devices are known in the art of pulp treatment. Again, the Applicant submits that Gillespie is not a screen cylinder, as such devices are known in the art of pulp treatment. Thus, again, the Applicants submit that Gillespie does not anticipate the invention recited in claim 1. The Applicant respectfully requests that this rejection be reconsidered and withdrawn.

With respect to the rejections of dependent claims 2, 3, 9, 26-29, the Applicant submits that these claims are not anticipated by Gillespie for the same reasons that claim 1, from which they depend, is not anticipated. The Applicant respectfully requests that these rejections be reconsidered and withdrawn.

With respect to the rejection of claim 10 in view of Gillespie, the Applicant submits that this claim is not anticipated by Gillespie for the same reasons that claim 1 is not anticipated. In invention recited in claim 10 is expressly described as "a screen plate for screening pulp flowing therethrough." As discussed above with respect to claim 1, the Gillespie device is not disclosed as a pulp-screening device and would be inappropriate for use as a pulp-screening device. The Applicant respectfully requests that this rejection be reconsidered and withdrawn.

With respect to the rejections of dependent claims 11, 12, 15, 17, 32, and 33, the Applicant submits that these claims are not anticipated by Gillespie for the same reasons that claim 10, from which they depend, is not anticipated. The Applicant respectfully requests that these rejections be reconsidered and withdrawn.

### 11. Response to 35 USC §103 Obviousness Rejections

On page 20 of the Action, the Patent Office rejected claims 3-5, and 33-35 under 35 USC §103(a) as obvious in view of Mathewson and any one of U.S. Patents 4,257,419; 4,206,574; 4,146,296; 3,768,648; and 3,709,186. The Applicant respectfully submits that none of these references provide the teachings that are missing from Mathewson. Therefore, these claims are patentably distinct from the cited art for the same reasons that their parent claim 1 is patentable. The Applicant requests that these rejections be reconsidered and withdrawn.

### 12. Allowable Subject Matter

Since claims 18-23 were not rejected on prior art, but rejected on §112 issues only, the Applicant assumes that by overcoming the §112 rejections by the above Amendment these claims are also allowable.

Reply to Office Action of January 5, 2006

# 13. Miscellaneous

The Applicant acknowledges the expiration date of the parent patent and that no reissue can issue after that date.

## 14. Surrender of Patent

In the first paragraph on page 22 of the Action, the Patent Office advises the Applicant (with reference to MPEP § 1416) of the requirement to surrender the ribboned patent or submit a statement addressing the loss or inaccessibility of the ribboned patent pursuant to 37 CFR 178(a). However, the Applicant respectfully submits that this requirement is most in view of the implementation of the amended rule 37 CFR 178(a). The amended rule does not require the submittal of the ribboned copy.

### 15. Deficiency of the Declaration

In the first paragraph on page 23 of the Action, the Patent Office claims that the declaration filed with the application is "defective because it fails to identify at least one error" in the as-issued patent. Though the Applicant believes that the "at least one error" in the as-issued patent would be evident from statements made in the declaration and the preliminary amendment submitted with the declaration (for example, the proposed corrections to wording of claims 13 and 14), the Applicant is now preparing and will soon submit a new declaration in a supplemental response. This new declaration will identify at least one specific error in the as-issued patent. For example, with reference to the present amendment, the new declaration will recite that the following errors appeared in the as-issued patent:

a) With respect to claim 24 (in the preliminary amendment and in the present amendment), the Applicant believes the Applicant has the right to claim that "screws for releasably connecting said screening medium and said backing plate" be claimed, by which the patentee claimed less than the patentee had the right to claim in the patent.

b) With respect to claim 25 (in the preliminary amendment and in the present amendment), Applicant believes the Applicant has the right to claim that "said means for releasably connecting includes a shrink-fit" be claimed, by which the patentee claimed less than the patentee had the right to claim in the patent.

c) With respect to claim 27 (in the preliminary amendment and in the present amendment), Applicant believes the Applicant has the right to claim that "the openings in said screening medium extend an axial distance substantially corresponding to at least 85% of the axial length of the screen cylinder" be claimed, by which the patentee claimed less than the patentee had the right to claim in the patent.

The bases for these limitations are clearly recited in Table 1 above.

Should the recitation of these errors in a new declaration not comply with the Patent Office's reissue application declaration requirements, the Applicant requests that the Patent Office notify the Applicant's undersigned agent <u>immediately</u> to avoid the preparation and filing of an insufficient declaration.

### 16. Conclusion

The Applicant believes that this Amendment addresses the rejections that appear in the subject Office Action and places the application in condition for allowance. An early and favorable action on the merits of the application is requested.

Should the Applicant's Amendment and Remarks not place the application in condition for allowance, the Applicant's undersigned Agent hereby requests an interview to (1) summarize all positions, especially in view of the length and diverse issues of this response; and (2) to answer any questions. The Applicant's Agent will contact Examiner Barry to arrange this interview.

Reply to Office Action of January 5, 2006

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicants' undersigned Agent invites the Examiner to telephone him at the number provided.

Respectfully submitted,

John Pietrangelo Agent for Applicant Registration No. 39,331

Dated: May 5, 2006.

### **HESLIN ROTHENBERG FARLEY & MESITI P.C.**

5 Columbia Circle

Albany, New York 12203-5160 Telephone: (518) 452-5600 Facsimile: (518) 452-5579

Attachments:

Excerpt from book Entitled: Handbook of Pulp & Paper Terminology, A Guide to Industrial and Technological Usage, by

Gary A. Smook (4 pages).

\* Revocation of Power of Attorney with New Power of Attorney and Change of Correspondence Address (1 page)